

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 00-6240-CR-DIMITROULEAS

UNITED STATES OF AMERICA,
Plaintiff,

vs.

KENYATTA JARON BROWN,

Defendant.

FILED BY
CLARENCE MADDOX
CLERK
SEP 14 11:00

MOTION FOR CONTINUANCE

COMES NOW that the Defendant KENYATTA JARON BROWN, by and through his undersigned attorney and moves this Court to enter its order continuing trial on the above styled matter and we show the Court as follows:

1. That the undersigned attorney was just retained on September 10, 2001, to represent the defendant on the above styled matter.
2. That there is a calendar call on this case on September 21, 2001.
3. That the Defendant requests this Court to enter its order continuing trial of this matter until sometime after October 15, 2001, to give the undersigned attorney sufficient time to prepare.
4. That the undersigned attorney has been diligent in preparing the defendant case and did receive discovery from the Government on September 10, 2001.

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5. That the undersigned attorney needs to file a Motion to Suppress in connection with this case and Memorandum of Law as this was a warrantless search of a vehicle where a gun was seized. The gun is a subject of this prosecution.

6. That the Defendant also wishes to file a motion regarding his speedy trial rights, as he has been in custody for a year on an unrelated charge and may well have a viable motion. That at this point the undersigned attorney needs to research that issue to see if the Motion can be filed in good faith.

7. That the undersigned attorney has talked with the Assistant United States Attorney Roger Powell and he has no objection to the Court granting this Motion.

8. This Motion is made in good faith and not for purpose of delay.

WHEREFORE, the Defendant needs additional time to prepare for Trial and request this Court to enter its order continuing same.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed to the United States Attorney Office, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301, on this 12th day of September 2001.

LAW OFFICE OF ROBERT C. STONE, P.A.
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By: 

ROBERT C. STONE, ESQ.
FLORIDA BAR NO.: 106117